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April 28, 2008

California Building Standards Commission
State and Consumer Services agency
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Dear Commissioners:

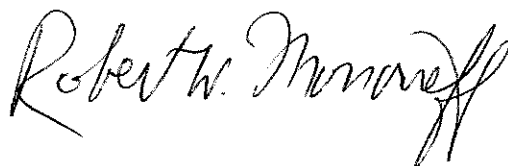
I would like to comment on the matter of wood product certification, responding to the March 18, 2008 notice re Title 24, CCR part 11, California Green Building Standards Code.

It is clear that both the "LEED" rating system and the "Build It Green" system recognize only "FSC" (Forest Stewardship Council) certified wood products to qualify. FSC certification is the only independently sponsored rating system, in contrast to the "CSA" (Canadian), "PEFC" (European), and "SFI" (Sustainable Forestry Initiative). All three of the latter are conceived and promoted by timber corporations and their allies. Of particular concern, SFI is the self-awarded "standard" used by Sierra Pacific Industries, (SPI), the corporation now engaged in rampant clear-cutting of the Sierra Nevada, with a goal of creating a million or so acres of tree farms this century.

The forests of the Sierra Nevada are a California treasure, a complex ecosystem of plant and animal communities which the practice of clear-cutting will completely destroy. They are also the source of 60 % of the state water supplies and the economic base for mountain communities relying on outdoor recreation for survival. Thus it would be a serious and tragic mistake to reward industry-based rating systems by including them on a par with FSC certification in the California Green Building Standards Code.

I am enclosing a joint statement from numerous respected environmental organizations warning of the deceptive SFI rating system. We hope your decision will help preserve the remaining undisturbed forests of California, and promote a return to selective and truly sustainable timber harvest programs.

Respectfully, Robert W. Moncrieff, M.D.

A handwritten signature in cursive script, reading "Robert W. Moncrieff". The signature is written in dark ink and is positioned below the typed name.



SFI = *TIMBER INDUSTRY LIE*

Why YOU shouldn't buy the Sustainable Forestry Initiative's forest certification claims, or trust SFI labels on wood or paper products

Forest certification should help consumers choose wood and paper products from forests managed to exemplary environmental and social standards. Unfortunately, the Sustainable Forestry Initiative (SFI) is a fake environmental certification and wood labeling program that greenwashes harmful industrial logging.

SFI Certifies Forest Destruction

Many SFI "certified" companies such as Pacific Lumber, Plum Creek, and Sierra Pacific Industries destroy forests by using practices like:

- logging or buying wood from old growth forests, endangered forests, or endangered species' habitats;
- logging or buying wood from some of the last unprotected wilderness in America's National Forests;
- replacing natural forests with ecologically-barren tree plantations or even residential sprawl; or
- using gigantic clearcuts, toxic herbicide spraying, or other harmful industrial logging practices.

SFI = Greenwashing of the Same-old Forest Industry

The SFI was created by the world's most powerful timber industry trade group—the American Forest & Paper Association (AF&PA). AF&PA companies, loggers, and other forestry interests comprise two-thirds of the "independent" Board that controls the SFI standards. Timber companies provide most of the SFI's funding. The AF&PA also controls the marketing and labeling programs for SFI products.

Loopholes in the SFI System

The SFI fails to include many elements needed for credible certification and product labeling. Among other things, the SFI's standards fail to adequately and consistently protect old growth, endangered forests, endangered species, water quality, fish and wildlife habitat, and natural forest characteristics necessary for ecosystem function. They also fail to adequately and consistently protect communities and indigenous peoples' rights. And SFI labels are allowed on wood and paper products from forests that don't even meet the SFI's weak standards, without disclosure of the products' real contents.

For more information on these and other problems with the AF&PA SFI, see the factsheets, reports, and other resources at www.dontbuysfi.com.

Brought to you by: American Lands Alliance, Center for Biological Diversity, Co-op America, Dogwood Alliance, Environment California, Environmental Protection Information Center, ForestEthics, Friends of Clayoquot Sound, Greenpeace, National Forest Protection Alliance, National Wildlife Federation, Natural Resources Council of Maine, Natural Resources Defense Council, Rainforest Action Network, Sierra Club, US Public Interest Research Group.